

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT REPORT FOLLOWING AUGUST
30, 2024 CONFERENCE ON
ADMINISTRATIVE MOTION RE CASE
SCHEDULE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

In response to the guidance provided by the Court during the August 30, 2024 videoconference, the parties have conferred further and agreed upon a shorter proposed extension of the case schedule for the Court's consideration. Whereas the parties' joint administrative motion requested a six-month extension of the case schedule, the parties' alternative proposed schedule, set forth below, would extend the case schedule by only four months. If these dates are acceptable to the Court, the parties can submit this schedule in the form of a proposed order:

<i>Pretrial Event</i>	<i>Current Date</i>	<i>Stipulated Alternative¹</i>
Substantial Completion of Document Production	September 20, 2024	November 5, 2024
Close of Fact Discovery	December 20, 2024	April 4, 2025
Joint Status Report on Protocol for Production of Expert-Related Documents	January 13, 2025	April 21, 2025
Non-Case-Specific and Causation Experts: Plaintiffs' Opening Reports	January 31, 2025	May 16, 2025
Case-Specific Experts: Plaintiffs' Opening Reports	January 31, 2025	May 19, 2025
Identification of Bellwether Trial Pools	February 6, 2025	May 23, 2025
Hearing re Identification of Bellwether Trial Pools	February 10, 2025	June 6, 2025
Non-Case-Specific and Causation Experts: Defendants' Responsive Reports ²	February 28, 2025	July 9, 2025
Case-Specific Experts Defendants' Responsive Reports	March 3, 2025	July 11, 2025
Non-Case-Specific and Causation Experts: Plaintiffs' Rebuttal Reports	March 14, 2025	July 30, 2025
Case-Specific Experts Plaintiffs' Rebuttal Reports	March 17, 2025	August 1, 2025
Close of Expert Discovery	April 7, 2025	August 27, 2025
Exchange Preliminary Witness Lists	April 21, 2025	September 10, 2025
Exchange Preliminary Proposed Jury Instructions	May 2, 2025	September 22, 2025

¹ Compared to the parties' prior proposed schedule, the stipulated alternative schedule shortens fact discovery by four weeks; reduces the time between close of fact discovery and Plaintiffs' expert reports by one week; reduces the time between Plaintiffs' expert reports and Defendants' responsive reports by one week; and reduces the time to file expert opposition and reply briefs by one week each. These modifications result in a trial date of February 10, 2026—four months after the Court's original trial date of October 14, 2025.

² Defendants reserve the right to request earlier deadlines for general causation expert disclosures and associated Rule 702 and summary judgment briefing to align with any such earlier deadlines set by Judge Kuhl in the JCCP. Plaintiffs object to Defendants' reservation of rights and note that the Court has already considered and rejected Defendants' effort to "phase" general causation. See CMO No. 8, ECF No. 581 at 1-2.

<i>Pretrial Event</i>	<i>Current Date</i>	<i>Stipulated Alternative¹</i>
Deadline to Meet and Confer Regarding Whether Any Additional and Unanticipated Discovery May Be Needed on Disclosed Witnesses and to Develop a Plan for Completing Any Agreed-Upon Additional Discovery	May 2, 2025	September 22, 2025
Submit Joint Status Report on Results of Meet and Confer on Additional and Unanticipated Discovery on Disclosed Witnesses	May 5, 2025	September 24, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opening Briefs	May 7, 2025	September 24, 2025
Submit Joint Letter Brief on Any Remaining Discovery Disputes on Disclosed Witnesses	May 9, 2025	September 29, 2025
File Proposed / Disputed Jury Instructions and Additional Questions for Juror's Survey Monkey Questionnaire	May 30, 2025	October 27, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opposition Briefs	June 4, 2025	October 27, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Reply Briefs	June 18, 2025	November 25, 2025
Hearing on Order in which Bellwether Cases Will Be Tried	June 27, 2025	December 3, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Hearing	July 16, 2025	December 19, 2025
Exchange of Initial Pretrial Disclosures per the Court's Standing Order	September 5, 2025	January 6, 2026
Submit Joint Statement Regarding Pretrial Meet and Confer Compliance	September 5, 2025	January 6, 2026
Compliance Deadline	September 12, 2025	January 13, 2026
Joint Trial Submissions per the Court's Standing Order	September 18, 2025	January 19, 2026
Pretrial Statement	September 26, 2025	January 19, 2026
Pretrial Conference	October 3, 2025	February 3, 2026
Jury Selection and Start of Trial	October 14, 2025	February 10, 2026

Pursuant to the Court's order during the August 30, 2024 videoconference, the parties identify below the anticipated discovery activities that would take place from now through April 4, 2025 (the parties' proposed fact discovery cut-off), should the Court grant their requested extension. Section I sets forth the anticipated fact discovery activities in each month, broken down by party. Section II sets forth a summary of anticipated expert discovery activities.

A more fulsome summary of the status of discovery to date will be contained in the parties' forthcoming Discovery Management Conference Statement (to be filed September 6, 2024), and the

parties refer the Court to their forthcoming CMC Statement for additional narrative descriptions of anticipated fact and expert discovery activities, should that additional detail be helpful to the Court. The parties each reserve their rights to challenge any and all of the various discovery activities identified by the opposing party below, including for relevance, burden, and proportionality.³

I. Anticipated Fact Discovery Activities

September 2024

• Defendants

- Meta will substantially complete production of custodial files for P.R., R.S., K.H., P.A.D., M.G.S., K.J., J.C., and J.G., and will produce privilege logs and any documents downgraded through the privilege log process for A.D., C.S., and K.A.
- YouTube will substantially complete production of custodial files of K.E., E.T., K.O., J.R., A.W.P., and T.K., and will produce an additional year of files from A.W.P. and F.G. after September 20, consistent with the parties' discussions.
- TikTok will substantially complete production of: Mandarin custodial files for A.C., J.Y., and R.L.; non-Mandarin custodial files for C.C., Y.F., S.L., J.F., C.B., E.E., J.R., J.E., L.Y., and R.M.; and Mandarin custodial files for C.C., Y.F., S.L., and J.F.

³ Defendants believe the schedule proposed in the parties' joint administrative motion was reasonable and justified, but agreed to the alternative schedule above in response to the Court's stated concerns and Plaintiffs' estimated dates for producing responsive documents. Defendants remain concerned that the proposed schedule is too aggressive and will not be achievable if Plaintiffs do not meet those dates, and does not permit Defendants adequate time to take offensive discovery (particularly, depositions) of critical personal injury ("PI") and school district ("SD") witnesses, given the volume of documents and other highly relevant data (e.g., forensic device imaging) that has yet to be produced, and the number of individuals Plaintiffs have identified as possessing "unique" information relevant to the case. Defendants reserve the right to argue in their forthcoming DMC Statement that Plaintiffs should be making more accelerated productions.

Plaintiffs object to Defendants' inclusion of the prior sentence, for several reasons. First, it exceeds the Court's direction that the parties not engage in advocacy in this filing and instead merely provide the Court with "succinct ... bullet point[s]." See ECF No. 1106. Second, all parties have reserved their rights to challenge specific discovery activities proposed by an opposing party in this filing for any reason, regardless of whether specifically mentioned here. See *supra*. Third, Defendants cannot at the same time (i) stipulate to a proposed schedule and (ii) reserve their rights to challenge it separately. That attempted "reservation" undermines the collaborative process the Court directed the parties to undertake. Plaintiffs themselves have numerous concerns about Defendants' ability to meet their stated production deadlines, but refrain from argumentation in this filing.

- Snap will continue its agreed-upon rolling productions with an additional production on September 20, including documents from all agreed-upon custodians. (Snap substantially completed productions of custodial files for J. Be, J. Bo, and J.S. in August.)
- **Plaintiffs**
 - PI/SD Plaintiffs will identify the 6 remaining custodians that PI/SD Plaintiffs have not yet identified as to Snap, and the 5 remaining custodians that Plaintiffs have not yet identified as to TikTok.
 - PI Bellwether Plaintiffs N.K. (on behalf of S.K.) and Klinten Craig will substantially complete productions.
 - SD Plaintiffs will finalize negotiations on search terms for SD Bellwether Plaintiffs and submit any remaining disputes to the Court.
 - SD Bellwether Plaintiffs will substantially complete document productions for the following witnesses identified by Defendants as anticipated deponents: Shelly Pettiford,⁴ Kycied Zahir, April Vaus, and Darnell Mangan (Irvington Public Schools); Christina Alton, Deborah Judd, and Buzz Williams (Board of Education of Harford County); Karen Chase, Mary Donahue, Emily Sortino, Peter Daquila, Vin D’Elia, and Connor Henderson (School District of the Chathams); Kera Howard, Hannah Watts, Daphne Noble, Jeremy Hall, Kansas Adams-Allen, and Kelli Gross (Breathitt County School District); Twila Wilson, Fronde Stille, Elah Hudon, Erin O’Conald, Dr. Joseph Williams, Ellen Nitz, and Alicia Kokkinis (Charleston County School District); Byron Schueneman, Denise Revels, Darnell Logan, Kishia Towns, and Norman Sauce (DeKalb County School District); Anthony Godfrey, Travis Hamblin, John Larsen, Fulvia Franco, Sharon Jensen, and Jared Covili (Board of Education of Jordan School District); Ken Kiser (Spartanburg 6 School District); Van Ayres, Gary Brady, Rob Nelson, Shellie Blackwood-Green, and Johan von Ancken (School Board of Hillsborough County); Anna Schwartz-Warmbrand, Julie Shivanonda, Rebecca Carrier, Vanessa Aguayo, Ricerdo Hernandez, and Dr. Gabriel Trujillo (Tucson Unified School District); and Chris Dougherty and Theresa Jones (Baltimore City Board of School Commissions).

October 2024

- **Defendants**
 - Meta will substantially complete production of custodial files for the remaining custodians (of the 39 total custodians) who were identified as anticipated deponents by Plaintiffs as of August 20.

⁴ All custodial file production timelines for school district custodians provided herein assume that the search terms most recently communicated to Defendants by the SD Plaintiffs apply, and that Defendants do not seek to expand further the list of custodians.

- Snap will make additional document productions and will substantially complete production of custodial files for M.J., J.S., K.W., N.Y., and D.L.
- TikTok will substantially complete production of Mandarin custodial files for C.B., E.E., J.R., J.E., L.Y., and R.M.
- TikTok will substantially complete production of non-Mandarin custodial files for W.Z., M.T., M.W., V.P., E.H., J.D., V.M., T.E., S.G., A.Z., and F.Z.
- **Plaintiffs**
 - Plaintiffs will depose 4 Meta witnesses: D.C., C.S., M.S., and K.J.
 - Plaintiffs will depose 4 TikTok witnesses: A.C., C.C., E.E., and R.L.
 - Plaintiffs will depose 2 Snap witnesses: N.Y. and M.J.
 - PI Bellwether Plaintiffs M.M. (on behalf of B.M.) and Lorine Hawthorne (individually and on behalf of B.H.) will substantially complete document productions.
 - The SD Bellwether Plaintiffs will substantially complete document productions for the following witnesses identified by Defendants as anticipated deponents: Michael LaSusa and Lydia McIntosh-Haye (School District of the Chathams); Dr. Omar Daniels, Dr. Alan Eggert, Dr. Justin Funderburk, and Dr. Mark Smith (Spartanburg 6 School District); Shavonna Coakley, Lisa Allison, Megan Bocchino, Anita Huggins, Michael Reidenbach, and Buffy Roberts (Charleston County School District); Ken Oertling, Jerry Smith, Ronald White, Stephanie Steib, Kelsey Hegel, and John Rome (St. Charles Parish Public Schools); John Amberg and Michael Bussacco (Irvington Public Schools); Devon Q. Horton, Michelle Dillard, Deboarh Moore-Sanders, Kimberly Frankin, and Kiana King (DeKalb County School District); Stacy McKnight, Phillip Watts, Aaron McIntosh, and William Noble (Breathitt County School District); Dr. Courtney Pate, Sabree Barnes, and Luanda Johnson (Baltimore City Board of School Commissions); Brad Sorensen, Stacey Worthen, McKinley Withers, and Carolyn Gough (Board of Education of Jordan School District); Leah Armstrong, Kim Bays, Tracye Brown, Rick Graves, Myrna Hoge, Michael Kelleher, and Holly Saia (School Board of Hillsborough County); and Frank Armenta, Karla Escamilla, Joseph Gaw, Lacey Grijalva, Joseph Hallums, and Blaine Young (Tucson Unified School District).

November 2024

- **All Parties**
 - All Parties (in both the MDL and JCCP proceedings) will finalize, and, if necessary, brief, all disputes about the scope of Defendants' written responses and objections to Plaintiffs' existing discovery requests.

1 • **Defendants**

- 2 • Meta will substantially complete its production of documents; and will produce privilege logs
3 and any documents downgraded through the privilege log process for P.R., R.S., K.H.,
4 P.A.D., M.G.S., K.J., J.C., J.G., M.R., D.C. and all other custodians who were identified as
5 anticipated deponents by Plaintiffs as of August 20.
- 6 • Snap will substantially complete its production of documents.
- 7 • YouTube will substantially complete its production of documents.
- 8 • TikTok will substantially complete production of all remaining custodial files and
9 documents, including Mandarin custodial files for W.Z., M.T., M.W., V.P., E.H., J.D., V.M.,
10 T.E., S.G., A.Z., and F.Z.
- 11 • Based on the SD Bellwethers' estimates herein of when they will produce custodial files for
12 certain anticipated deponents, and the expected volume of produced documents, Defendants
13 expect to take 5-10 depositions of school district witnesses in late November.
- 14 • If the PI Bellwethers' estimated custodial file production timelines are met, Defendants
15 expect to take approximately 12 depositions in the PI Bellwether cases in November.
- 16 • Based on the AGs' estimates herein of when they will substantially complete document
17 productions, and the pendency of the parties' dispute regarding Meta's ability to take party
18 discovery of State agencies, Meta expects to take 5-10 depositions across the States in
19 November.⁵

20 • **Plaintiffs**

- 21 • PI Bellwethers, SD Bellwethers, and AGs will substantially complete production of
22 documents.
- 23 • Plaintiffs will review documents produced by Defendants on November 5, the volume of
24 which remains unknown to Plaintiffs, but which Plaintiffs expect to number in the millions.
- 25 • Plaintiffs will depose 6 Meta witnesses: M.R., K.H., P.D., J.G., K.A., and J.C.
- 26 • Plaintiffs will depose TikTok witness J.Y., as well as an anticipated 4-6 additional TikTok
27 witnesses.
- 28 • Plaintiffs will depose approximately 3 YouTube witnesses previously identified as priority
custodians.

⁵ If Judge Kang resolves the parties' dispute regarding State agency discovery in the AGs' favor, Meta anticipates needing to take at least 70 additional depositions beyond those reflected in these bullets. The State AGs reserve all rights to object to these depositions.

- Plaintiffs will depose Snap witness A.T., as well as an anticipated two additional Snap witnesses.
- SD Bellwether Plaintiffs will substantially complete document productions for the following witnesses identified by Defendants as anticipated deponents: Jesse Bailey and Jessica Howard (Breathitt County School District); Kade Rogers, Charmaine Williams, Stevie Stillinger, Patrick O'Malley, Tamika Green, Erin Granier, Tresa Webre, Angelle Babin, Regina McMillan, and David Schexanydre (St. Charles Parish Public Schools); Michael Anderson and Bryce Dunford (Board of Education of Jordan School District); Dr. Sherry Eppelsheimer (Charleston County School District); Vasanne Tinsley, Cheryl Watson-Harris, Stephen Green, Charles Burbidge, Masana Maillard, Michael Bell, JoAnn Harris, and Joyce Morley (DeKalb County School District); Reginald Lamptey (Irvington Public Schools); Lori Gironda (School District of the Chathams); Bryant Roberson, Jennifer Sims, Caleb Thrower, Dr. Maddie Jurek, Darrell Belgrave, Cynthia Robinson, Brian Calsing, and Shawn Wootten (Spartanburg 6 School District); Dr. Sonja Brookins Santelises, Ketia Stokes, Lori Hines, Taiisha Swinton-Buck (Baltimore City Board of School Commissioners); Karen Perez, Tanya Arja, Marie Whelan, and Romaneir Johnson (School Board of Hillsborough County); and Bernard Hennigan, Sean Bulson, Joseph Harbert, Mary Beth Stapleton, Michael O'Brien, Barbara Canavan, Joseph Schmitz, Patti Jo Beard, Drew Moore, and Jillian Lader (Board of Education of Harford County).

December 2024

• Defendants

- Meta will produce privilege logs and any documents downgraded through the privilege log process for all other Meta custodians.
- Based on the SD Bellwethers' estimates herein of when they will produce custodial files for certain anticipated deponents, the expected volume of produced documents, and holiday schedules, Defendants expect to take 10-15 depositions of school district witnesses in December.
- Based on the PI Bellwethers' estimated custodial file production timelines, Defendants expect to take approximately 12 depositions of PI Bellwethers and third parties in December.
- Based on the AGs' estimates herein for when they will substantially complete document productions, and the pendency of the parties' dispute regarding the Meta's ability to take party discovery of State agencies, Meta expects to take 5-10 depositions across the States in December.

• Plaintiffs

- Plaintiffs will depose 3 Meta witnesses: R.S., D.K., and P.R.
- Plaintiffs will depose approximately 3 YouTube witnesses previously identified as priority custodians.

- Plaintiffs will depose 4-6 TikTok witnesses.
- Plaintiffs will depose 4 Snap witnesses.

January 2025

- **Plaintiffs**

- Plaintiffs anticipate deposing 10 Meta witnesses.
- Plaintiffs anticipate deposing 4-8 TikTok witnesses.
- Plaintiffs anticipate deposing 4-8 Snap witnesses.
- Plaintiffs will depose approximately 4 YouTube witnesses previously identified as priority custodians and 1-2 additional YouTube witnesses.

- **Defendants**

- Defendants anticipate taking 25-40 depositions of school district witnesses in January.
- Based on the PI Bellwethers' estimated custodial file production timelines, Defendants expect to take approximately 16 depositions of third parties in January.
- Based on the AGs' estimates herein for when they will substantially complete document productions, and the pendency of the parties' dispute regarding the Meta's ability to take party discovery of State agencies, Meta expects to take 20-25 depositions across the States in January.

February 2025

- **All Parties**

- The parties (in both the MDL and JCCP proceedings) will serve all remaining Interrogatories and Requests for Admission (with the understanding that any party may petition the appropriate Court to show good cause why it is necessary to serve such additional discovery after February 14, 2025).

- **Defendants**

- Defendants anticipate taking 25-40 depositions of school district witnesses in February.
- Based on the PI Bellwethers' estimated custodial file production timelines, Defendants expect to take approximately 16 depositions of third parties in February.
- Based on the AGs' estimates herein for when they will substantially complete document productions, and the pendency of the parties' dispute regarding the Meta's ability to take

party discovery of State agencies, Meta expects to take 20-25 depositions across the States in February.

- **Plaintiffs**

- Plaintiffs anticipate deposing 10 additional Meta witnesses, and the State AGs will take up to 3 additional AG-specific depositions of Meta witnesses if needed.
- Plaintiffs anticipate deposing 4-8 TikTok witnesses.
- Plaintiffs anticipate deposing 4-8 Snap witnesses.
- Plaintiffs will depose approximately 4 YouTube witnesses previously identified as priority custodians and 1-2 additional YouTube witnesses.

March 2025

- **Plaintiffs**

- Plaintiffs anticipate deposing up to 10 Meta witnesses, and the State AGs will take up to 3 AG-specific depositions of Meta witnesses if needed.
- Plaintiffs anticipate deposing 4-8 TikTok witnesses.
- Plaintiffs anticipate deposing 4-8 Snap witnesses.
- Plaintiffs will depose approximately 4-5 YouTube witnesses.

- **Defendants**

- Defendants anticipate completing document productions in March.
- Defendants anticipate taking 25-40 depositions of school district witnesses in March.
- Based on the PI Bellwethers' estimated custodial file production timelines, Defendants expect to take approximately 16 depositions of third parties in March.
- Based on the AGs' estimates herein for when they will substantially complete document productions, and the pendency of the parties' dispute regarding the Meta's ability to take party discovery of State agencies, Meta expects to take 20-25 depositions across the States in March.

II. Anticipated Expert Discovery Activities

The parties set forth below anticipated expert discovery deadlines over four discrete periods under their alternative proposed schedule.

April 4, 2025 through May 19, 2025

- The PI/SD Plaintiffs will prepare opening reports for approximately 20 experts, and the State AGs will prepare opening reports for approximately 8 AG-specific experts.

May 19, 2025 through July 3, 2025

- Defendants will prepare responsive reports for an anticipated minimum of approximately 24 experts.

July 3, 2025 through July 24, 2025

- Plaintiffs will prepare rebuttal reports for an anticipated 20 experts, and the State AGs will prepare rebuttal reports for an anticipated 8 AG-specific experts.

July 24, 2025 through August 27, 2025

- The Parties will take and defend the depositions of approximately 50 anticipated experts, averaging 10 depositions per week during this period.

Respectfully submitted,

DATED: September 4, 2024

By: /s/ Previn Warren

PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 BATTERY STREET, 29TH FLOOR
SAN FRANCISCO, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
55 CHALLENGER ROAD, 6TH FLOOR
RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT
MORGAN & MORGAN
633 WEST FIFTH STREET, SUITE 2652
LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

JOSEPH VANZANDT
BEASLEY ALLEN

234 COMMERCE STREET
MONTGOMERY, LA 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500

PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WALSH LAW
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-600-6725
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: 646-666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

SIN-TING MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

JOSEPH E. MELTER
KESSLER TOPAZ MELTZER & CHECK LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212-213-8311
hnappi@hrsclaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436

Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
KESSLER TOPAZ MELTZER & CHECK LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

Attorneys for Individual Plaintiffs

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,
pro hac vice
Senior Assistant Attorney General
Lauren M. Dickey, CO Reg. No. 45773
First Assistant Attorney General
Megan Paris Rundlet, CO Reg. No. 27474
Senior Assistant Solicitor General
Elizabeth Orem, CO Reg. No. 58309
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

ROB BONTA

Attorney General
State of California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorneys General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorney General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.Oneill@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

RUSSELL COLEMAN

Attorney General

Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),

Pro hac vice

Philip Heleringer (KY Bar No. 96748),

Pro hac vice

Zachary Richards (KY Bar No. 99209),

Pro hac vice

Daniel I. Keiser (KY Bar No. 100264),

Pro hac vice

Matthew Cocanougher (KY Bar No. 94292),

Pro hac vice

Assistant Attorneys General

1024 Capital Center Drive, Suite 200

Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

DANIEL.KEISER@KY.GOV

MATTHEW.COCANOUGH@KY.GOV

Phone: (502) 696-5300

Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen, SBN 275203

COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: (424) 332-4800

Facsimile: + 1 (424) 332-4749

Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*

Paul W. Schmidt, *pro hac vice*

COVINGTON & BURLING LLP

One City Center

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Email: pajones@cov.com

Email: pschmidt@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

FAEGRE DRINKER LLP

By: /s/ Andrea Roberts Pierson

Andrea Roberts Pierson, *pro hac vice*

FAEGRE DRINKER LLP

300 N. Meridian Street, Suite 2500

Indianapolis, IN 46204

Telephone: + 1 (317) 237-0300

Facsimile: + 1 (317) 237-1000

Email: andrea.pierson@faegredrinker.com

Email: amy.fiterman@faegredrinker.com

Amy R. Fiterman, *pro hac vice*

FAEGRE DRINKER LLP

2200 Wells Fargo Center

90 South Seventh Street

Minneapolis, MN 55402

Telephone: +1 (612) 766-7768

Facsimile: +1 (612) 766-1600

Email: amy.fiterman@faegredrinker.com

Geoffrey Drake, *pro hac vice*
KING & SPALDING LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Tel.: 404-572-4600
Email: gdrake@kslaw.com
Email: dmattern@kslaw.com

David Mattern, *pro ha vice*
KING & SPALDING LLP
1700 Pennsylvania Avenue, NW, Suite 900
Washington, D.C. 20006
Telephone: +1 (202) 626-2946
Email: dmattern@kslaw.com

Attorneys for Defendants TikTok Inc. and ByteDance Inc.

MUNGER, TOLLES & OLSON LLP
By: /s/ Jonathan H. Blavin
Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degtyareva@mto.com
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,
Suite 500 E
Washington, D.C. 20001-5369

Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Email: lauren.bell@mto.com

Attorneys for Defendant Snap Inc.

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Brian M. Willen

Brian M. Willen (*pro hac vice*)

WILSON SONSINI GOODRICH & ROSATI

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Telephone: (212) 999-5800

Facsimile: (212) 999-5899

Email: bwillen@wsgr.com

Lauren Gallo White (SBN 309075)

Samantha A. Machock (SBN 298852)

WILSON SONSINI GOODRICH & ROSATI

One Market Plaza, Spear Tower, Suite 3300

San Francisco, CA 94105

Telephone: (415) 947-2000

Facsimile: (415) 947-2099

Email: lwhite@wsgr.com

Email: smachock@wsgr.com

Christopher Chiou (SBN 233587)

Matthew K. Donohue (SBN 302144)

WILSON SONSINI GOODRICH & ROSATI

953 East Third Street, Suite 100

Los Angeles, CA 90013

Telephone: (323) 210-2900

Facsimile: (866) 974-7329

Email: cchiou@wsgr.com

Email: mdonohue@wsgr.com

Attorneys for Defendants YouTube, LLC and Google LLC

WILLIAMS & CONNOLLY LLP

By: /s/ Joseph G. Petrosinelli

Joseph G. Petrosinelli (*pro hac vice*)

jpetrosinelli@wc.com

Ashley W. Hardin (*pro hac vice*)

ahardin@wc.com

680 Maine Avenue, SW

Washington, DC 20024

Telephone.: 202-434-5000
Fax: 202-434-5029

Attorneys for Defendants YouTube, LLC and Google LLC

MORGAN, LEWIS & BOCKIUS LLP
By: /s/ Yardena R. Zwang-Weissman
Yardena R. Zwang-Weissman (SBN 247111)
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238
Email: yardena.zwang-weissman@morganlewis.com

Brian Ercole (*pro hac vice*)
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416
Email: brian.ercole@morganlewis.com

Stephanie Schuster (*pro hac vice*)
1111 Pennsylvania Avenue NW
NW Washington, DC 20004-2541
Tel.: 202.373.6595
Email: stephanie.schuster@morganlewis.com

Attorneys for Defendants YouTube, LLC and Google LLC

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 4, 2024

By: /s/ Ashley M. Simonsen